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VIA ECF

Hon. Evelyn Padin, U.S.D.J.
United States District Court for the District of New Jersey
50 Walnut Street
Newark, NJ 07102

**Re: Novartis AG, et al., v. Novadoz Pharmaceuticals, et al.,
Civil Action No. : 25-849**

Dear Judge Padin:

This office, along with Debevoise & Plimpton LLP, represents Plaintiffs Novartis AG and Novartis Pharmaceuticals Corporation in the above-captioned litigation. We write on behalf of Novartis and in response to the May 19, 2025 letter (ECF No. 49 (the "Letter")), filed by defendants Novadoz Pharmaceuticals LLC, MSN Pharmaceuticals Inc., and MSN Laboratories Private Ltd. (collectively, "MSN" or "Defendants").

Novartis writes to clarify that MSN's statements, concerning the timing of any launch of its generic product absent the injunction in this case, represent only MSN's positions on its alleged right to launch. Novartis is defending its patent rights through litigation separate from this case in which Novartis is defending its trade dress rights. Novartis disagrees with MSN's representation that "all patent barriers to MSN's entry will end by July 16, 2025 at the latest." Novartis also disagrees with MSN's suggestion that it is entitled to any first-mover advantage. (See ECF No. 42, pp. 8–9). Novartis submits that MSN is and would be appropriately enjoined in both the patent litigations and this trade dress matter at least given the different scope of the rights at issue.

/s/ Mark M. Makhail
Mark M. Makhail

cc: All Counsel of Record (via ECF)